

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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|---------------------------------------|---|------------------------------|
| In re: |) | |
| |) | |
| ALPHA NATURAL RESOURCES, INC., |) | Chapter 11 |
| et al., |) | |
| |) | Case No. 15-33896-KRH |
| |) | |
| Debtors |) | |

VERIFIED STATEMENT OF SPILMAN THOMAS & BATTLE, PLLC
PURSUANT TO BANKRUPTCY RULE 2019

Spilman Thomas & Battle, PLLC (“Spilman”), attorneys for the parties-in-interest listed below (together, the “Parties”) in connection with the bankruptcy cases of the above-captioned debtors (collectively, the “Debtors”), submits this Declaration (the “Declaration”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

1. Spilman is serving as counsel for the following Parties in connection with the Debtors’ bankruptcy cases:

| Name | Address for Purposes of this Declaration |
|---|--|
| Penn Virginia Operating Co., LLC | Three Radnor Corporate Center, Suite 300 Radnor, PA 19087 |
| McCreery Coal Land Company | 130 Main Street, Beckley, WV 25801 |
| Pardee Minerals, LLC | 1717 Arch Street, Suite 4010, Philadelphia, PA |
| JRY Natural Resources, LLC | 990 Washington Street, Suite 315 Dedham, MA 02026 |
| The David J. Pierce Trust U/A dated February 23, 2011 | 4281 Express Lane, Suite L4451 Sarasota, FL 34238-2602 |
| Donald L. Blankenship | P. O. Box 927 Belfry, Kentucky 41514 |
| Christian Colliery Company | 149 Vassar Drive Lake Worth, FL 33460 |

Peter M. Pearl, Esq. (VSB #22344)
Spilman Thomas & Battle, PLLC
Post Office Box 90
Roanoke, Virginia 24002
Telephone: (540) 512-1800
Facsimile: (540) 342-4480
ppearl@spilmanlaw.com

2. Each of the Parties may hold claims against the Debtors arising out of applicable agreements, law, or equity pursuant to their respective relationships with the Debtors. The Parties are in the process of analyzing their claims against the Debtors and will identify such claims against the Debtors in proofs of claim filed prior to the applicable deadline.

3. Spilman represented Penn Virginia Operating Co., LLC (“Penn Virginia”) prior to the filing of these cases. Spilman represented McCreery Coal Land Company (“McCreery”) prior to the filing of these cases. Spilman represented Pardee Minerals LLC (“Pardee”) prior to the filing of these cases (“Pardee”). JRY Natural Resources, LLC (“JRY”) retained Spilman for this case. The David J. Pierce Trust U/A dated February 23, 2011 (“Pierce”) retained Spilman for this case. Spilman represented Donald L. Blankenship (“Blankenship”) prior to the filing of these cases. Spilman represented Christian Colliery Company (“Christian Colliery”) prior to the filing of these cases.

4. At the time of the filing of the petitions by the Debtors, Spilman had claims in the aggregate approximate amount of \$14,000.00 against Independence Coal Company, Inc. (matter concluded), Marfork Coal Company, Inc. (matter stayed), Knox Creek Coal Corporation (Fourth circuit appeal – MSHA claim), Sidney Coal Company, Inc. (matter stayed) for certain discreet litigation matters handled on behalf of those entities. None of Penn Virginia, McCreery, Pardee, JRY, Pierce, Blankenship, or Christian Colliery has a claim against any of these entities.

5. As for a copy of the instruments, if any, whereby Spilman is empowered to act on behalf of the Parties, Spilman is employed only as counsel and is not authorized by instrument or otherwise to act for the Parties except in that capacity.

6. Spilman reserves the right to amend, revise, and/or supplement this Declaration. Nothing herein should be construed as an admission or factual representation by any of the Parties.

7. The undersigned hereby declares under penalty of perjury that the foregoing is true and correct to the best of his knowledge and belief.

Dated: December 14, 2015

By: /s/ Peter M. Pearl
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of December, 2015, a copy of the foregoing was delivered by electronic means to all parties who receive notice in this case pursuant to the Court's CM/ECF system, and to the following by U.S. Mail:

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| Carl E. Black, Esquire David G. Heiman, Esquire Thomas A. Wilson, Esquire Jones Day North Point 901 Lakeside Avenue Cleveland, OH 44114 Jeffrey B. Ellman, Esquire Jones Day 1420 Peachtree Street N.E., Suite 800 Atlanta, GA 30309 Robert W. Hamilton, Esquire Jones Day 326 John H. McConnell Blvd., Suite 600 Columbus, OH 43215 Tyler P. Brown, Esquire Shannon E. Daily, Esquire Henry P. Long, III, Esquire Justin F. Paget, Esquire J.R. Smith, Esquire Hunton & Williams 951 East Byrd Street Richmond, VA 23219 | U.S. Trustee Judy A. Robbins Office of the U.S. Trustee – Region 4-R 701 East Broad Street, Suite 4304 Richmond, VA 23219 Hugh M. Bernstein Office of the U.S. Trustee 101 West Lombard Street, Suite 2625 Baltimore, MD 21201 Robert B. Van Arsdale Office of the U.S. Trustee 701 East Broad Street, Suite 4304 Richmond, VA 23219 Counsel for U.S. Trustee Alpha Natural Resources, Inc. Attn: Richard H. Verheij, Esq. One Alpha Place P. O. Box 16429 Bristol, VA 24209 Stephen E. Hessler, Esq. Brian Schartz, Esq. Kirkland & Ellis, LLP 601 Lexington Avenue New York, New York 10022 |
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| | Gregory F. Pesce, Esq. Kirkland & Ellis, LLP 300 North LaSalle Chicago, Illinois 60654 |
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By: /s/ Peter M. Pearl
Counsel